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2008 JUL 30 AM 10:55

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

KNH

'08 MJ 1988

UNITED STATES OF AMERICA
vs.
Ramon SANCHEZ-Castellanos

) Magistrate's Case No.

) COMPLAINT FOR VIOLATION OF
18 U.S.C. 545

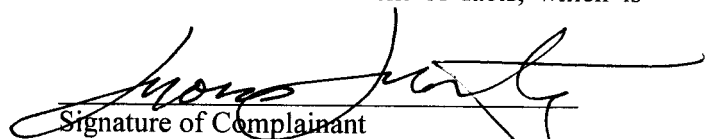
) General Smuggling

The undersigned complainant being duly sworn states:


COUNT ONE

That on or about June 28, 2008, within the Southern District of California, defendant Ramon SANCHEZ-Castellanos did knowingly and willfully, with intent to defraud the United States, smuggle or clandestinely introduce, or attempted to smuggle or clandestinely introduce, approximately 100 kilograms (220 pounds) of iodine which should have been invoiced and was not, into the United States from a place outside thereof; in violation of Title 18, United States Code, Sections 545.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.


Signature of Complainant
U.S. Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence, this 30th day of June, 2008.


United States Magistrate Judge

1 United States of America
2 VS.
3 Ramon SANCHEZ


4 PROBABLE CAUSE STATEMENT

5
6 I, Special Agent Moises Martinez, declare under penalty of perjury, the following is true
7 and correct:

8
9 On June 28, 2008 at approximately 5:00 AM, Customs and Border Protection Officer
10 (CBPO) Vincent Nguyen was performing primary duties at vehicle primary lane three. Ramon
11 SANCHEZ-Castellanos, accompanied by Maria ALVARADO and Gerardo SANCHEZ,
12 attempted to enter the United States from Mexico through the Otay Mesa Port of Entry, San
13 Diego, California. Ramon SANCHEZ was the driver of a 2006 Nissan Quest bearing California
14 license plate 5PUZ062. Officer received two negative Customs declarations from SANCHEZ.
15 Officer Nguyen inspected the vehicle and discovered two zipped dark-colored nylon duffel bags
16 and saw the word "corrosive" on a dark brown cardboard barrel. At this time, Officer Nguyen
17 referred SANCHEZ, the two passengers and vehicle to secondary inspection lot. A secondary
18 inspection of the vehicle revealed a total of two cylindrical shaped cardboard containers
19 containing approximately 100 kilograms (120 pounds) of iodine in the rear area of the vehicle.
20 During a Post-Miranda interview, SANCHEZ stated that he had bought the iodine in Tijuana and
21 would be paid five hundred dollars by individuals in Ontario, California for smuggling the iodine
22 into the United States.

23
24 SANCHEZ was arrested and charged with violation of Title 18 USC 545, General
25 Smuggling, and was booked into the Metropolitan Correction Center, San Diego, CA.

26
27 Executed on June 28, 2008 at 3:00 pm
28


SPECIAL AGENT

On the basis of the facts presented in this probable cause statement consisting of 2 pages,
I find probable cause to believe the that the defendant(s) named in this probable cause statement
committed the offense on June 28, 2008 in violation of Title 18 USC 545, General Smuggling.


United States Magistrate Judge

6/28/08 at 8:49pm
Date/Time